



ALFRED POLIZZOTTO III\*

EMILIO RODRIGUEZ, JR.

\*(ADMITTED NEW YORK, NEW JERSEY)

LONG ISLAND OFFICE  
1129 Northern Boulevard Ste 404  
Manhasset, New York 11030

February 25, 2022

**VIA ELECTRONIC FILING**

The Honorable Gabriel W. Gorenstein  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *Erdman v. Victor*, 20-CV-04162-LGS-GWG**

Dear Judge Gorenstein:

This firm represents Defendant Adam Victor in the above-captioned defamation action brought by *Pro Se* Plaintiff Tyler Erdman and we write this letter joining with the Plaintiff, who will be making a separate request under seal, in requesting an extension of the discovery deadline of February 25, 2022.

The parties have been speaking for the last week about the possibility of making the abovementioned request. We last spoke yesterday on the telephone, at about 4:30 pm EST, for about 25 minutes. I have presently engaged a team of 14 document reviewers in order to supplement the privilege log as requested by the Plaintiff and ordered by the court in your Order dated February 4, 2022. Various types of remote searches were engaged to avoid the time, labor and cost of full document review, but the results proved to be inadequate. It will take approximately three to four weeks to complete the task at a six-figure cost. The review has already begun but it needs the extra time to be completed. Plaintiff has consented to this extension of time, and I have also consented to the extra time he will request in his letter. Due to the issues he will explain, we both request an extension of 45 days to complete party discovery.

PLEASE RESPOND TO BROOKLYN OFFICE

Yours faithfully  
**Polizzotto & Polizzotto, LLC**

/s/ Emilio Rodriguez  
Emilio Rodriguez (ER2526)